

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

**APPLICATION AND AFFIDAVIT FOR SEARCH WARRANT**

I, Justin M. Page, United States Postal Inspector, do hereby swear and affirm the following facts as being true to the best of my knowledge, information, and belief:

1. I am a United States Postal Inspector, assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States Mail. I have been a Postal Inspector since July 2012. As part of my duties, I investigate incidents where the United States mail system is used for the purpose of transporting non-mailable matter, including controlled substances such as marijuana, cocaine, methamphetamine and heroin, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and substances mailed in violation of Title 18, United States Code, Section 1716.
2. Based on my experience, training and discussions with other law enforcement officers experienced in drug investigations, I know that certain indicators exist when persons use the United States Mails to ship controlled substances from one location to another. Indicators for parcels that contain controlled substances include, but are not limited to the following:
  - a. It is a common practice for the shippers of controlled substances and proceeds of the sale of controlled substances to use Express Mail because the drugs arrive faster and on a predictable date, and

this system allows shippers to keep track of the shipment. With regards to Express Mail parcels, shippers pay for the benefit of being able to confirm the delivery of the parcel by checking the U.S. Postal Service Internet Website and/or calling a toll free number.

- b. These packages in many instances contain a fictitious return address, incomplete return address, no return address, the return address is same as the addressee address, or the return address does not match the place where the parcel was mailed from. These packages are also sometimes addressed to or from a commercial mail receiving agency (i.e., UPS Store). These address practices are used by narcotics traffickers to hide the true identity of the person(s) shipping and/or receiving the controlled substances from law enforcement officials.
- c. In order to conceal the distinctive smell of controlled substances from narcotic detector dogs, these packages tend to be wrapped excessively in bubble-pack and wrapping plastic, and are sometimes sealed with the use of tape around all the seams. Also, the parcels often contain other parcels which are carefully sealed to prevent the escape of odors. Sometimes perfumes, coffee, dryer sheets, tobacco or other smelling substances are used to mask the odor of the controlled substances being shipped.
- d. When the shipper mails controlled substances from a particular

area/state, the proceeds from the sale of these controlled substances may be returned to the shipper. Based on experience and discussions, there are known source states, where controlled substances are mailed from, including California, Oregon, Washington, Arizona and Texas. I also know based on my training and experience larger Alaska cities, such as Fairbanks and Anchorage, are known sources for controlled substances to smaller communities in Alaska.

e. I know from training and discussions with other law enforcement officers that the following controlled substances are likely to be found during parcel interdictions: marijuana, methamphetamine, cocaine, LSD, psilocybin mushrooms, heroin, opium, and MDMA.

3. In this warrant application, I seek this Court's authority to search Express Mail Parcel EI711268874US, which is described in greater detail below, for controlled substances in violation of Title 21 U.S.C. Sections 841(a)(1) and 843(b) and Title 18 U.S.C. Section 1716.

**RELEVANT FACTS PERTAINING TO EXPRESS MAIL PARCEL**

**EI711268874US**

4. On August 1, 2013, the Express Mail Parcel EI711268874US that is the subject of this search warrant affidavit, was identified by a Postal Inspector, during an interdiction, due to the characteristics used by traffickers of narcotics (hereinafter referred to as the subject parcel), addressed to "Ms D. Qilaqusuk, Box 128, Kaktovik, Alaska 99747", from

“I Soplu, Box 60545, Fai, AK 99706.” A photocopy of the label of the subject parcel is attached as **Exhibit 1**. The subject parcel weighs approximately 19 pounds and 11 ounces, and is described as a white “Ready Post” Express Mail box with clear plastic tape covering the seams, measuring approximately 15 x 12 x 10 inches, bearing hand written sender and addressee information. The subject parcel is affixed with a Postal Validation Imprinter (PVI) sticker in the amount of \$54.95, and was mailed on July 31, 2013 from Fairbanks, AK 99709.

5. On August 1, 2013, I was conducting an interdiction at the Fairbanks Main Post Office. I identified the subject parcel and another parcel from the same sender to the same recipient. The second parcel is bearing Express Mail EI711268865US addressed to “Ms D. Qilaqusuk, Box 128, Kaktovik, Alaska 99747”, from “I Soplu, Box 60545, Fai, AK 99706.” A photocopy of the label of the subject parcel is attached as **Exhibit 2**. Based on my training and experience and the experience of other law enforcement officers who are involved in drug investigations, I know narcotics traffickers will often send and receive multiple Express Mail articles within a short time period of each other.
6. This parcel was also identified due to characteristics drug traffickers use to prevent the detection of drugs being shipped through the mail. For this parcel, these characteristics included, but are not limited to:
  - a. Sender not associated at address. (Per Accurant, a search database under Lexis Nexis, there is no record for “I Soplu” first or last

name associated with Box 60545, Fairbanks, AK 99706. The data provided by Accurant is a combination of over 33 billion records from over 8,800 different data sources which are updated daily, weekly, monthly, and annually, depending on the particular data source.) PO Box 60545 is a real address in Fairbanks, AK.

- b. Recipient not found at address. (Per Accurant, a search database under Lexis Nexis, there is no record for D. Qilaqusuk associated with PO Box 128 Kaktovik, AK. There is no record for D. Qilaqusuk residing in Kaktovik, AK.) PO Box 128 is a real address in Kaktovik, AK.
  - c. Sent from source area. (See paragraph 2 d. Fairbanks is a known source area to outlining smaller communities in Alaska.)
7. On August 1, 2013, at approximately 3:40 AM, North Slope Borough Police Officer Ian Stroud had canine "Banjo" examine the subject parcel. Officer Stroud, "Banjo's" handler, advised me that the canine had exhibited a change in behavior consistent with the presence of an odor of a controlled substance the canine is trained to recognize. Attached hereto as **Exhibit 3** and incorporated herein by reference is a true and correct copy of a written statement provided by Officer Stroud, which sets forth "Banjo's" training and experience as a narcotics detector dog. The subject parcel is currently in my custody at the Fairbanks Main Post Office, 5400 Mail Trail Road, Fairbanks, AK 99709, and is in its original sealed and intact condition.

8. Based on my training and experience as a Postal Inspector and the  
aforementioned factors, your affiant believes there is probable cause to  
believe that the subject package contains controlled substances, and/or  
other evidence of violations of Title 21, United States Code, Sections  
841(a)(1) and 843(b), and Title 18, United States Code, Section 1716

FURTHER AFFIANT SAYETH NAUGHT.

Redacted Signature

Justin M. Page  
Postal Inspector

Subscribed and sworn to  
before me, this 1st day of  
August 2013.

Redacted Signature

U.S. MAGISTRATE JUDGE

